

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES of AMERICA)	Criminal No. 03-10234-MLW
)	
v.)	
)	
JOSHUA GOLDSMITH)	
_____)	

MOTION TO MODIFY TERMS OF
PRETRIAL RELEASE

Defendant Joshua Goldsmith respectfully requests that this Court modify the terms of his pre-trial release to allow him to return to his residence at 12808 Zanga Street, Los Angeles, CA 92066, and allow his supervision to be returned to Central District of California. In support, Mr. Goldsmith, through his attorney, states as follows:

1. On May 25, 2004, Joshua Goldsmith was released on pre-trial release.
2. On that same day, his supervision was transferred to Central District of California, where he had lived for six months, and where he was gainfully employed.
3. On November 4, 2004 Joshua Goldsmith was ordered by this court to return to Massachusetts while on pre-trial release.
4. Since that date, Mr. Goldsmith has been fully compliant with the conditions of his release. He has reported to pre-trial three times a week. He has also undergone regular drug testing: first 3 times a week, then twice, then once, and now at random.
5. Mr. Goldsmith has also been able to maintain his employment with Content House, a graphic design firm, while in Massachusetts.

6. However, Mr. Goldsmith is concerned that he will not be able to maintain his employment or to keep his residence in Los Angeles if he does not return to his home and regular employment in Century City, California.
7. I spoke with Pretrial Services Officer David Picozzi on Tuesday, June 2, 2005. He stated that Mr. Goldsmith has been fully compliant with the conditions of his release since returning to Massachusetts in November. He has no objection to Mr. Goldsmith's request to having his supervision transferred to California.
8. United States Attorney Susan Poswistilo assents to this motion

WHEREFORE, Mr. Goldsmith respectfully requests that this Court grant his Motion to Modify Terms of Pretrial Release to allow him to return to California where he is gainfully employed.

Respectfully Submitted
Joshua Goldsmith,
By His Attorney,

//s//Stephen Hrones
Stephen Hrones (BBO No. 242860)
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CERTIFICATE OF SERVICE

I, Jessica Hedges, hereby certify that I have caused a copy of the foregoing document to be served, where unable to do electronically, on Assistant United States Attorney Susan Poswistilo, 1 Courthouse Way, Boston, MA 02210, by first class mail, this 15th day of June, 2005.

//s//Jessica D. Hedges
Jessica D. Hedges